

REMARKS

Claims 1-26 are pending in this application. Reconsideration of the rejections in view of the following remarks is respectfully requested.

Rejections under 35 USC §103(a)

Claims 1-26 were rejected under 35 U.S.C. §103(a) as being obvious over the admitted prior art of the instant disclosure (hereinafter APA) in view of Greenwalt'375 or Greenwalt'862, and GB'384.

In the APA, the Examiner appears to refer to the description in the specification, at page 1, lines 15-16, that "Although there are cases that iron plants, steel making plants, and power plants are constructed so as to be adjacent to a petrochemical complex, each plant is independently arranged." The specification, however, also makes it clear that "efficiency of energy utilization for heat and power is not so high on the whole" and that "waste materials are mostly transported to other places for disposal, and effective utilization of waste materials is not considered."

The Examiner also alleged that "Both of Greenwalt'375 and Greenwalt'862 teach . . . that it was well known . . . to include a cement production (the construction products, 52) facility (plant) in a steel making complex in order to efficiently use slag and slag dust products from the steel making facility.

Greenwalt'375 and Greenwalt'862 merely disclose a steel making plant with oil refining and power generating processes. The relevant disclosures in the specification of Greenwalt'375 and Greenwalt'862, are basically identical as follows: "The slag contains the sulfur freed from the combustion of the petroleum coke. Slag is disposed of; for example, by forming construction products 52." Thus, Greenwalt'375 and

U.S. Patent Application Serial No. 09/978,021

Greenwalt'862 disclose that slag is disposed of preferably by converting it to construction material or by forming construction products 52.

In Greenwalt'375 and Greenwalt'862, however, there is no description of what the construction material and the construction products mean. These terms appear to simply mean slag blocks or particles, which can be used for construction industry. Thus, there is no basis that these disclosures indicate a cement production facility.

The Examiner further alleged that GB'384 teaches that "it was well known expedient . . . to include units dealing with the treatment of waste materials within industrial plant complexes themselves . . . in particular sulfur containing waste gases" and that it is a well known expedient "to deliver products from an industrial plant to locations outside of the plant itself since this is the entire purpose of the plant (production and delivery of products to others). Such disclosure or allegation does not remedy the deficiencies of APA, Greenwalt'375 and Greenwalt'862.

Therefore, APA, Greenwalt'375, Greenwalt'862 and GB'384 do not teach or suggest, among other things, the steps of "arranging basic industrial plants including an oil refining plant, an oil-fired power plant, a cement plant, and a steelmaking plant in close proximity to or adjacent to each other;" and "transporting to said cement plant at least two of spent catalyst waste from the oil refining plant, drain sludge from a storage tank of the oil-refining plant, slag from the steelmaking plant and dust from the steelmaking plant."

The specific disposition of materials in the cement plant was not known until the present invention was made introducing a cement plant to the basic industrial plant complex.

U.S. Patent Application Serial No. 09/978,021

At least for these reasons, claims 1 and 15 patentably distinguish over admitted prior art, Greenwalt'375 and Greenwalt'862. Claims 2-14, depending from claim 1, and claims 16-26, depending from claim 15, also patentably distinguish over the cited references for at least the same reasons.

If, for any reason, it is felt that this application is not now in condition for allowance, the Examiner is requested to contact Applicants undersigned attorney at the telephone number indicated below to arrange for an interview to expedite the disposition of this case.

In the event that this paper is not timely filed, Applicants respectfully petition for an appropriate extension of time. Please charge any fees for such an extension of time and any other fees which may be due with respect to this paper, to Deposit Account No. 01-2340.

Respectfully submitted,

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